

Chambers Copy

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
BROOKLYN DIVISION

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT
★ FEB 23 2012
BROOKLYN OFFICE

UNITED STATES * DOCKET NO. 11cr413 (SLT)
v. *
ROBERT GEOGHEGAN * February 15th, 2012

CONSENT MOTION TO MODIFY CONDITIONS OF PRE TRIAL RELEASE

1.

Mr. Geoghegan's conditions of Pre Trial release prohibit him from travelling outside of the Eastern and Southern Districts of New York and the District of Connecticut without prior approval.

father 2.

Mr. Geoghegan's *father* suffered a heart attack on February 13th, 2012 and is in a coma. His prospects for recovery are not good. Therefore, the accused would like to travel to West Palm Beach, Florida from August 17th. He plans to travel by car with his sister.

3.

Mr. Geoghegan has been in constant contact with undersigned, has appeared in court at all scheduled proceedings promptly and has complied with all requests from Pre Trial services.

4.

Therefore, I am seeking a limited modification allowing Mr. Geoghegan to travel to Florida on August 17th, 2012 to attend to his father.

5.

I have contacted the Assistant United States Attorney and they have no objection to this request being granted. Additionally, his Pre Trial Services officer is aware of this request and Agent Vasquez told me she also has no objection to this request being granted. This is a limited request and any other travel and/or modification will be applied for separately.

RESPECTFULLY SUBMITTED,
s/J. Patten Brown, III
J. PATTEN BROWN, III
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The application is
SO ORDERED.

☒ granted.
☐ denied.

s/ SLT

~~_____
Sandra L. Townes, U.S.D.J.~~

Dated:

February 23, 2012
Brooklyn, New York

CERTIFICATE OF SERVICE

I hereby certify that this Motion to Amend Conditions of Pre Trial Release by J. Patten Brown, III was forwarded electronically via the Court's electronic filing system to all counsel of record this 15th day of February, 2012.

S/J. Patten Brown, III
J. Patten Brown, III
Attorney at Law